



U.S. Department of Justice

United States Attorney

Application granted. The initial pretrial conference scheduled for 9/2/2021 is adjourned to 9/9/2021 at 11:30 a.m. No adjustments to the proposed Civil Case Discovery Plan and Scheduling Order are required.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
August 17, 2021

By ECF

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Jorge Alves v. United States of America*, No. 21 Civ. 4492 (PMH)

Dear Judge Halpern:

This Office represents the government in the above-captioned matter. I write, pursuant to Rule 1.C of Your Honor's Individual Practices in Civil Cases, to respectfully request that the initial pretrial conference scheduled for September 2, 2021 at 10:30am, be adjourned and rescheduled.

I am scheduled to defend a deposition on September 2, and due to limited witness availability, I have been unable to reschedule the deposition for another date. Accordingly, I respectfully request that the initial pretrial conference in this matter be rescheduled. This is my first request for an adjournment of the conference, and Plaintiff's counsel consents to the request.

The parties have conferred regarding their availability, and propose one of the following alternative dates, if the Court is available: September 9, September 10 (after 11am), September 15 (before 3pm), and September 17, 2021.

To the extent the Court is amenable to rescheduling the conference for a different date, the parties defer to the Court regarding the submission of a new proposed civil case discovery plan and scheduling order; the dates provided in the discovery plan that was submitted on August 11, 2021, ECF No. 13, were based off of a September 2 conference date. The parties can submit a revised discovery plan in advance of the conference or, alternatively, be prepared to discuss dates at the rescheduled conference.

I thank the Court for its consideration of this request.

Respectfully,

AUDREY STRAUSS
United States Attorney
Southern District of New York

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